

MERCER COUNTY

HIPAA PROCEDURE: REASONABLE SAFEGUARDS

GENERAL POLICY

It is the policy of Mercer County (the "County") to have in place appropriate administrative, technical, and physical safeguards to protect the privacy of Personal Medical Information. More specifically, the County shall reasonably safeguard Personal Medical information (i) from any intentional or unintentional use or disclosure that is in violation of the policies and procedures; and (ii) to limit incidental uses or disclosures made pursuant to an otherwise permitted or required use or disclosure.

PROCEDURE

When using or disclosing Personal Medical Information, the County shall make reasonable efforts to limit the information used or disclosed to the minimum necessary to accomplish the intended purpose of the use, disclosure, or request. (See Procedure regarding The "Minimum Necessary" Standard). Further:

Conversations about Personal Medical Information shall be kept to a minimum while in public places;

Computer monitors shall be turned away from public view;

Computer passwords shall be confidential and shall not be shared with others or posted in or around the computer;

Fax machines shall be placed in secure locations, and Personal Medical Information shall be retrieved from the machines promptly;

Business Associate Agreements shall be obtained from all appropriate persons/entities;

Confidentiality Agreements shall be signed with all persons/entities that do not qualify as business associates;

File cabinets containing medical records must remain locked and the personnel with access to such records limited. Such authorized personnel must have a key or pass code to access the medical record cabinets;

The identity and authority of requesting individuals must be verified for permitted disclosures of Personal Medical Information (see Procedure regarding Verification of Identity for Individuals Requesting Personal Medical Information);

Upon disposal, documents containing Personal Medical Information must be shredded or destroyed.;

The Privacy Officer shall conduct periodic “walk-through” inspections of the office premises to determine whether there are any obvious unintentional disclosures of Personal Medical Information (i.e., chalk boards with Personal Medical names written, open file cabinets with Personal Medical names showing on files, etc). Personal Medical Information (whether oral or written) must be protected and kept confidential at all times, unless permitted to be disclosed under the County’s policies and procedures.

Should there be any questions or concern regarding this policy and procedure, you may contact the Mercer County HIPAA Privacy Officer at (609) 989-6655. In the event that any County employee, or any other person, makes such an inquiry, the County will not take any retaliatory action of any kind against the party.